



Applicability Test Follow-up



NSR Retooling Team

October 23, 2003

Follow-up October 29, 2003

Wisconsin Department of Natural Resources

Items Addressed

- **13 - Representative Time Period**
- **14 - Start-up, Shut down, Malfunction Emissions in Baseline**
- **15 - Different Pollutant/Different Baseline**
- **16 - New Units**
- **17 - Projection Period**
- **18 - Start-up, Shut down, Malfunction Emissions in Projection**

13. Look Back Period Options

- **24 month period in previous 10 years**
- **24 month period in previous 5 years**
- **24 month period in previous 5 years, ability to petition for 10 years**
- **24 month period in previous 10 years, coupled with 10 year projection excluding demand based increases**



14 & 18. Start up, shut down & malfunction

- **Include start up, shut down & malfunction emissions in look back and projection**
- **Include same number of start up, shut down & malfunction occurrences in projection as used in look back**
- **Include same number or more in projected period as used in look back**



15. Different Pollutants, Different Baseline Periods

- **Baseline period can vary from pollutant to pollutant**
- **Baseline period same for all pollutants**
- **2 in 5 look back - differing baselines**
2 in 10 look back - same baseline
- **Same baseline unless varying baselines approved**

16. New Unit Baseline Emissions

- **New units in baseline at potential rate**
- **If 2 years operation data, post baseline, then choose 12 months of data**
- **24 months of operation data, use annual average of any 24 month period of operation**



17. Projection Period

- **5 or 10 year projection, depending on project impact on capacity**
- **Consistent projection period with look back**
- **10 year projection with 2 in 10 look back, no demand adjustment**



Hybrid Options

- **Same look back period as projection period**
- **Use of 10 year look back period requires same period be used for all pollutants, 5 year look back allows for different pollutant baselines**
- **10 year look back and projection, delete demand exclusion**

Demand Exclusion

- **10 years used in EPA rule for baseline because it is reflective of a “business cycle”**
- **“Business cycle” is intended to capture highs and lows in production rates**
- **Demand peaks should be captured in “business cycle”**
- **How important is the demand exclusion?**
- **Do we have any examples how this would be applied in practice?**



Projects involving new and replacement units

- **Applicability test not available for new emissions units**
- **Replacement units excluded from use of applicability as well**
- **Netting available for replacement projects using “actual emissions” definition, not “baseline actual emissions” definition**